

Rowley, W
Part 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

17 CV 9250

ROSITA KOLLMAN a/k/a ROSITA KOHLMANN, and
SIEGBERT KOHLMANN ENTERPRISES, LTD.,

Plaintiffs,

-against-

J.P. MORGAN CHASE, N.A.,

Defendant.

Civil Action No.:

~~PROPOSED~~ ORDER TO
SHOW CAUSE CAUSE
WITH TEMPORARY
RESTRAINT

UPON the reading of the Complaint in this action, filed on November 27, 2017, the accompanying Declaration of Sylvie Lisker-Sporn ("Lisker-Sporn"), executed on November 21, 2017, together with the exhibits annexed thereto, the accompanying Emergency Declaration of Stephen B. Meister, executed on November 27, 2017, together with the exhibits annexed thereto, the accompanying Memorandum of Law, and for good cause appearing therefor, it is hereby:

ORDERED, that Defendant show cause before a motion term of this Court, at Room 750 United States Courthouse, 500 Pearl Street, in the City, County, and State of New York, on November 29, 2017, at 4:00 p.m., or as soon thereafter as counsel may be heard, why an order should not be issued, pursuant to Rule 65 of the Federal Rules of Civil Procedure, ordering and/or preliminarily enjoining and restraining Defendant, all of Defendant's agents and employees, and all other persons acting in concert with Defendant:

- (i) to name Lisker-Sporn as a signatory on any bank accounts owned by Plaintiffs (and held at Defendant's banks) until final resolution of this action;
- (ii) to remove all signatories, except for Lisker-Sporn, on any bank accounts owned by Plaintiffs (and held at Defendant's banks) until final resolution of this action; and

- (iii) from permitting any future signatories, unless authorized by Lisker-Sporn or the Court, on any bank accounts owned by Plaintiffs (and held at Defendant's banks) until final resolution of this action.

IT IS FURTHER ORDERED that, pursuant to Rule 65 of the Federal Rules of Civil Procedure, pending a hearing on the application for a preliminary injunction, Defendant, Defendant's agents and employees, and all other persons acting in concert with Defendant, are temporarily ordered and/or restrained and enjoined:

- (i) from withdrawing any funds from any bank accounts owned by Plaintiffs (and held at Defendant's banks), other than for ordinary banking fees removed by and for the benefit of Chase, if any;
- (ii) to identify all current signatories on any bank accounts owned by Plaintiffs (and held at Defendant's banks), and produce that information to Plaintiffs within two business days of the signing of the initial order in this matter; and
- (iii) to produce to Plaintiffs all account statements for any bank accounts owned by Plaintiffs (and held at Defendant's banks), covering the previous five years, within two business days of the signing of the initial order in this matter.

IT IS FURTHER ORDERED, that personal service of a copy of this Order, the Complaint, the Declaration of Sylvie Lisker-Sporn, the Emergency Declaration of Stephen B. Meister, and the accompanying Memorandum of Law upon Defendant or its counsel, on or before November 29, 2017, at 10:00 a.m., shall be deemed good and sufficient service thereof.

DATED: New York, New York
November 27, 2017

[Signature]

, United States District Judge
Part I Judge